



November 30, 2023

Via ECF

Honorable Andrew L. Carter Jr.
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

MEMO ENDORSED

**Re: Longside Ventures LLC, et al. v. Hempacco Co., Inc., et al.
1:22-cv-08152-ALC**

Dear Judge Carter:

This firm represents Plaintiffs in the above captioned matter. Pursuant to Your Honor's Order dated October 16, 2023, the parties have met and conferred and jointly submit the following proposed schedule for jurisdictional discovery:

- The parties shall serve interrogatories and/or demands for documents pertaining to the jurisdictional issues raised in the Court's September 29, 2023 Order by **December 22, 2023**.
- The parties shall serve responses/objections to interrogatories and/or demands for documents by **January 22, 2024** and produce documents by **February 15, 2024**.
- Plaintiffs shall be entitled to take the depositions of Defendants Hempacco Co., Inc. and Mexico Franchise Opportunity Fund, LP pursuant to F.R.C.P. 30(b)(6), the scope of which shall be limited to the jurisdictional issues raised in the Court's September 29, 2023 Order. These depositions will not preclude Plaintiffs from taking further depositions of these parties (and others, if necessary) regarding the substance of the claims. These depositions shall be completed by **March 29, 2024**.
- Nothing herein shall preclude Defendants from seeking the depositions of Plaintiffs, limited to the jurisdictional issues raised in the Court's 9/29/23 Order, subject to good cause shown. Plaintiffs reserve all objections to Defendants seeking such depositions.
- Plaintiffs will file their Amended Complaint by on or before **April 30, 2024**.

The parties respectfully request that the Court So Order the above schedule.

Respectfully submitted,

**CAMPOLO, MIDDLETON
& MCCORMICK, LLP**

By: Jeffrey V. Basso, Esq.
cc: All parties via ECF

SO ORDERED:

ANDREW L. CARTER, JR.
UNITED STATES DISTRICT JUDGE

Dated: November 30, 2023
New York, NY